

# EXHIBIT E

To Opposition To Motion To Continue Discovery And To  
Extend The Pretrial Schedule

filed

October 23, 2007

in

Civil Action 04-40219 FDS

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

INNER-TITE CORP.,

Plaintiff

v.

DEWALCH TECHNOLOGIES, INC.,

Defendant.

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CIVIL ACTION NO. 04-40219 FDS

**DEFENDANT'S RESPONSES TO PLAINTIFF'S  
FIRST SET OF REQUESTS FOR ADMISSION**

To: Plaintiff Inner-Tite Corp.

Defendant DeWalch Technologies, Inc. ("DeWalch") hereby objects and responds to Plaintiff's First Requests for Admissions, as follows:

Request No. 1:

Admit or deny that Inner-Tite Corp., plaintiff in the present action, is the owner of all right, title and interest in the '691 patent.

Response:

DeWalch has made reasonable inquiry and the information known or readily obtainable is insufficient to enable it to admit or deny this request for admission.

Request No. 2:

Admit or deny that claim 1 of the '691 patent covers each of the embodiments shown in Figures 1 - 6B of the '691 patent.

Response:

Denied.

Request No. 3:

Admit or deny that with respect to claim 1 of the '691 patent, the ProLock product is for use in combination with a utility box having a bottom, a side wall, and a cover which may be

opened to gain access to the interior of the box, and which when closed, overlaps an upper edge of the side wall.

Response:

Denied.

Request No. 4

Admit or deny that with respect to claim 1 of the '691 patent, the ProLock product is a lock assembly for maintaining the cover in its closed position.

Response:

Denied.

Request No. 5

Admit or deny that with respect to claim 1 of the '691 patent, the ProLock product includes a bracket having first and second mutually spaced flanges integrally joined by an intermediate web.

Response:

Denied.

Request No. 6

Admit or deny that with respect to claim 1 of the '691 patent, the ProLock product includes a jaw mechanically interengaged with and carried by the bracket for movement between the first and second flanges, the bracket being configured for removable mounting on the side wall, with the intermediate web interposed between the cover and the upper edge of the side wall, and with the first flange and the jaw respectively located adjacent exterior and interior surfaces of the side wall.

Response:

Denied.

Request No. 7

Admit or deny that with respect to claim 1 of the '691 patent, the ProLock product includes force exerting means for urging the jaw towards the first flange to thereby clamp the side wall therebetween.

Response:

Denied.

Request No. 8

Admit or deny that with respect to claim 1 of the '691 patent, the ProLock product includes a cap having a lip configured and dimensioned to overlap the cover, and interlocking means for securing the cap to the bracket.

Response:

Denied.

Respectfully submitted,



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ATTORNEYS FOR DEFENDANT  
DEWALCH TECHNOLOGIES, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document has been duly served pursuant to the Rules of Court and Federal Rules of Civil Procedure upon counsel of record as follows, on this the 5th day of May, 2005:

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